

REMARKS

This is in response to the Office Action dated March 11, 2004. New claim 32 has been added. Claims 15-32 are pending.

Claim 15 stands rejected under 35 U.S.C. Section 103(a) as being allegedly unpatentable over Percival in view of Keith. This Section 103(a) rejection is respectfully traversed for at least the following reasons.

Claim 15 requires "storing a compressed representation of the image at the server and transmitting at least part of the compressed representation of the image from the server to at least one client, the method comprising: transforming the image into a frequency domain to form frequency domain coefficients; after said transforming, subdividing the frequency domain coefficients corresponding to the image into at least one block, each block comprising at least one transformed coefficient; compressing, via entropy coding, at least a first block and at least a second block into different independently decodable coding units, respectively; after said compressing, storing at least one of the first and second coding units on the server; receiving a request at said server; and responsive to the request, transmitting from the server to at least one client the coding unit(s) corresponding to the request so that upon receiving the request the coding units(s) corresponding to the request are transmitted to the at least one client without the server having to employ further entropy encoding with respect thereto." The cited art fails to disclose or suggest the invention of claim 15.

Percival does not divide the image into separately decodable *compressed* coding units as alleged by the Office Action. In particular, the Haar transform does not compress the image. Percival even states that the transformed coefficients take up as much memory as the original pixels (see column 6, lines 60-65). Any compression done in Percival is done *after* a request for

that part of the image. In the method of claim 15, the image is stored compressed. The cited art fails to disclose or suggest this, either alone or in the alleged combination.

The Haar transformed is described in two steps. First, pixel combining and then 2 pixel shuffling. After both of these steps, the image has been divided into sub bands (Figure 6). This is similar to what is done by, for instance, a wavelet transform (see Keith). However, it is AFTER this step that applicants' subdivision of the sub bands into sets of coefficients is done. These sets of coefficients are then compressed into independently decodable coding units.

Keith describes a wavelet transform followed by compression of the coefficients but does not mention sub-dividing the wavelet coefficients into sets. Thus, Keith is entirely unrelated to the invention of claim 15.

It would not have been obvious for one of ordinary skill in the art to have combined the basic concept of wavelet transforms in Keith with the Haar transform in Percival, and then add the differences and further steps mentioned above, e.g. subdividing the confidents into subbands. There is absolutely no suggestion or hint in the art of doing this. The cited art clearly fails to disclose or suggest the invention of claim 15.

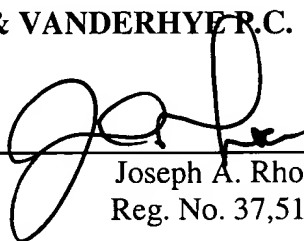
Claim 28 requires "means for identifying at least one of a plurality of independently decodable coding units which contains at least one transform coefficient needed to reconstruct the region of interest of the image, the independently decodable coding units being defined as objects compressed by using entropy coding; and means for transmitting, from the client to at least one server, a request for said at least one identified independently decodable coding unit needed to reconstruct the region of interest of the image." Again, the cited art fails to disclose or suggest the invention of claim 28.

For at least the foregoing reasons, it is respectfully requested that all rejections be withdrawn. All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

NIXON & VANDERHYE R.C.

By: _____

A handwritten signature in black ink, appearing to be 'J. Rhoa', is written over a horizontal line.

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